

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JASON COLEMAN and JESSICA CASEY,
on behalf of the RVNB Holding, Inc.
Employee Stock Ownership Plan and on
behalf of a class of all other persons similarly
situated,

Plaintiffs,

vs.

NEIL M. BROZEN, *et al.*,
Defendants.

Case No.: 3:20-CV-01358-E

**DECLARATION OF LISA PAVLIK ON
BEHALF OF SIMPLURIS, INC.**

DECLARATION OF LISA PAVLIK

I, Lisa Pavlik, hereby declare:

1. I am employed as a Manager of Client Services by Simpluris, Inc. (“Simpluris”), the claims administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Dr., Costa Mesa, CA 92626. My telephone number is (714) 415-2872. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris is a Class Action Settlement Administration company located in Costa Mesa, California. It was founded by individuals who have each managed hundreds of settlements, along with professionals in the areas of Software Development, Third-Party Claims Administration, Mail-House Operations, and Call Center Support Management.

3. Simpluris was selected by Counsel for Jason Coleman and Jessica Casey (“Plaintiffs”) to provide settlement administration services in the *Coleman and Casey on Behalf of RVNB Holdings vs Brozen, et al.*, (the “Settlement”). In this capacity, Simpluris is charged with (a) sending Class Notices to the Settlement Class (b) establishing the settlement website (c) establishing a telephone support line and (d) all tax withholding and reports for the Qualified Settlement Fund and its distributions.

NOTIFICATION TO THE CLASS

4. On or about February 5, 2025, Simpluris received the Court-approved *Notice of Class Action Settlement* (hereafter “Class Notice”). The Class Notice advises Settlement Class Members of their right to object to the Class Settlement, complete online an Election / Rollover form, do nothing, and the implications of each such action. The Class Notice advises Settlement Class Members of applicable deadlines and other events, including the Final Approval Hearing, and how Class Members could obtain additional information.

5. On or about March 19, 2025, Simpluris was provided a list containing each Settlement Class Member’s full names, last known mailing addresses, Social Security Numbers, Branch, number of vested shares (collectively, “Class List”). The Class List contained data for one thousand one hundred and seventy-two (1,172) individuals.

6. On or about April 23, 2025, Settlement Notices were mailed to one thousand one hundred and seventy-two (1,172) Settlement Class Members with addresses contained in the Class List via First Class mail or updated via the NCOA search. A copy of the Settlement Notice is attached hereto as Exhibit A.

7. As of June 6, 2025, 339 Class Notices were returned by the United States Postal Service as undeliverable. 315 Class Notices, representing 315 Class Members, have been re-mailed based on updated addresses obtained through forwarded mail or searches performed by Simpluris. 21 Class Notices have been returned as undeliverable.

8. As of June 6, 2025, Class Notices mailed to 1130 Class Members (representing approximately 96.4% of the Class) have not been returned as undeliverable, and Class Notices to 21 Class Members were undeliverable and an updated address was not found.

9. As of June 6, 2025, no objections have been received.

WEBSITE, EMAIL ADDRESS, AND TOLL-FREE TELEPHONE HELPLINE

10. Simpluris prepared and maintains a Settlement website, <https://RVNBESOPSettlement.com> that includes important dates and deadlines, and Settlement-related documents, such as the Settlement Agreement. An online Election / Rollover Form module has been active during the Response Period starting April 23, 2025.

11. An email address was included in the Class Notice for the purpose of allowing Settlement Class Members to reach Simpluris to make inquiries regarding the Settlement. The email address included in the Class Notice is info@RVNBESOPSettlement.com.

12. A toll-free telephone number was included in the Class Notice for the purpose of allowing the Settlement Class Members to call Simpluris and to make inquiries regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and will remain in operation throughout the settlement process. Callers will have the option to speak with a live call center representative during normal business hours or to leave a message and receive a return call during non-business hours. The toll-free telephone number, (866) 675-3082 will be included in the Class Notice.

ADMINISTRATION COSTS

13. Simpluris' total costs for services in connection with the administration of this Settlement, including fees incurred and anticipated future costs for completion of the administration, are \$26,416.00.

Simpluris' work in connection with this matter will continue with processing Rollover Forms, calculations of the settlement checks, issuance, and mailing of those settlement checks, etc., and to do the necessary tax reporting on such payments.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 6th day of June 2025, in Otsego, Minnesota.



LISA PAVLIK

Exhibit A

NOTICE OF CLASS ACTION SETTLEMENT
in
RVNB ESOP LITIGATION
Coleman, et al. v. Brozen, et al., Case No. 3:20-cv-01358-E (N.D. Tex.)

«IMbJullBarcodeEncoded»

«FirstName» «LastName» «BusinessName»
«Address1» «Address2»
«City», «State» «Zip»

SIMID «SIMID»
Barcode printed ■ ■ ■

PLEASE READ THIS SETTLEMENT NOTICE CAREFULLY.
This is a notice of a proposed class action settlement in the above-referenced lawsuit.
If you are a member of the Class, the settlement will affect your legal rights.
This is not a solicitation from a lawyer.
You have not been sued.

- A Settlement has been reached in a class action lawsuit concerning the RVNB Holdings, Inc. Employee Stock Ownership Plan (the “Plan”). The class action lawsuit involves whether the Plan, which was established in 2012, was administered in accordance with the Employee Retirement Income Security Act of 1974 (“ERISA”), including whether the stock held by the Plan was redeemed at fair market value following the termination of the Plan on June 29, 2017. ERISA is the federal law that regulates and sets minimum standards for the administration of most retirement plans in the private sector, including the Plan. The United States Secretary of Labor (the “Secretary”) filed a related lawsuit, which is also being settled as part of this Settlement.
- The defendants in the class action are Defendants Neil M. Brozen, Robert Peterson, Jr., Vasilisa Peterson, Mike Paxton, Nick Bouras, Sterling Investment Partners III, L.P., Nicole Peterson 2012 Irrevocable Trust, and Brooke Peterson 2012 Irrevocable Trust. The defendants in the Secretary’s action are Robert Peterson, Vasilisa Peterson, Paul Generale, Neil Brozen, Nicole Peterson 2012 Irrevocable Trust, Brooke Peterson 2012 Irrevocable Trust, and the RVNB Holdings, Inc. Employee Stock Ownership Plan. Collectively, the defendants in both actions are the “Defendants.” Defendants deny all claims, and nothing in the Settlement is an admission or concession on Defendants’ part of any fault or liability whatsoever.
- The Settlement will provide, among other things, for a \$12,727,272.73 Qualified Settlement Fund that will be allocated to eligible Settlement Class Members after any Court-approved deductions for Attorneys’ Fees and Costs, Case Contribution Awards, and Administrative Expenses.
- The terms and conditions of the Settlement are set forth in the Settlement Agreement filed with the Court on January 9, 2025. Capitalized terms used in this Notice but not defined in this Notice have the meanings assigned to them in the Settlement Agreement. The Settlement Agreement is available at <https://RVNBESOPSettlement.com>. Certain other documents also will be posted on that website. You should visit that website if you would like more information about the Settlement or the lawsuit. All papers filed in this lawsuit are also available for review via the Public Access to Court Electronic Records System (PACER), at <http://www.pacer.gov>.
- The Settlement Class (whose members are “Settlement Class Members”) includes all vested Participants in the Plan as of June 29, 2017, or their Beneficiaries or Alternate Payee. All Defendants, other than Nick Bouras, are excluded from the Settlement Class.
- Your rights and the choices available to you—and the applicable deadlines to act—are explained in this Notice. Please note that neither RVNB Holdings, Inc. (“RVNB”) nor any current or former employees, attorneys, or representatives of RVNB may advise you as to what the best choice is for you or how you should proceed.

- The Court still has to decide whether to give its final approval to the Settlement. Payments under the Settlement will be made only if the Court finally approves the Settlement in this Class Action and the Consent Judgment in the related Secretary’s Action, and those final approvals are upheld in the event of any appeal.
- A Fairness Hearing will take place on July 22, 2025 at 2:00 p.m., before the Honorable Ada Brown, United States District Court for the Northern District of Texas, 1100 Commerce Street, Dallas, Texas 75242-1003, in Courtroom 1310, to determine whether to grant final approval of the Settlement and approve the requested Attorneys’ Fees and Costs, the requested Case Contribution Awards to the Named Plaintiffs, and Administrative Expenses. If the Fairness Hearing is rescheduled, or if it is held by video conference or telephone, a notice will be posted on the Settlement Website at <https://RVNBESOPSettlement.com>.
- Any objections to the Settlement, or to the requested Attorneys’ Fees and Costs, Case Contribution Awards, and/or Administrative Expenses, must be filed with the Clerk of Court and served in writing on Class Counsel and Defense counsel, as identified in Item 11 below.

YOUR LEGAL RIGHTS AND OPTIONS UNDER THE SETTLEMENT:	
PAYMENT OPTION ONE: ROLLOVER TO AN INDIVIDUAL RETIREMENT ACCOUNT OR QUALIFIED EMPLOYER PLAN	<p>This lawsuit concerns a retirement plan. You have the option of receiving your share of the Settlement in the form of a direct rollover to an individual retirement account or qualified employer plan. You may make an election by completing an Election Form online at https://RVNBESOPSettlement.com on or before July 22, 2025. Rollovers will be effectuated only if and when the Court gives final approval to the Settlement and the Settlement becomes effective.</p> <p><u>Payments distributed in the form of a rollover will not be subject to automatic withholding for taxes.</u></p> <p>For additional information, see Item 6 below.</p>
PAYMENT OPTION TWO: CHECK MAILED DIRECTLY TO YOU	<p>If you do nothing in response to this Notice, the Settlement Administrator will attempt to mail your share of the Settlement directly to you by check. Checks will be distributed only if and when the Court gives final approval to the Settlement and the Settlement becomes effective.</p> <p><u>Payments made directly by check are subject to automatic tax withholding and tax reporting, as determined by the Settlement Administrator.</u></p> <p>For additional information, see Item 6 below.</p>
YOU CAN OBJECT (NO LATER THAN JUNE 23, 2025)	<p>If you wish to object to any part of the Settlement, or to the requested Attorneys’ Fees and Costs, Case Contribution Awards, and/or Administrative Expenses, you must file and postmark your objection and any supporting documents with the Clerk of the Court, and mail copies to Class Counsel and Defense Counsel (as identified in Item 11, below), at least 30 calendar days before the Fairness Hearing. Please note that you will not be permitted to make an objection to the Settlement if you do not comply with the requirements for making objections.</p>
YOU CAN ATTEND A HEARING ON JULY 22, 2025	<p>You may also attend the Fairness Hearing and speak at the Fairness Hearing on July 22, 2025. If you wish to attend the hearing and speak at the hearing, you must provide Class Counsel and Defense counsel (as identified in Item 11 below) with notice of your intent to appear postmarked at least 14 calendar days before the Fairness Hearing. Please note that you will not be permitted to speak at the Fairness Hearing if you do not comply with the requirements for making an objection.</p>

The Class Action

The case is called *Coleman, et al. v. Brozen, et al.*, Case No. 3:20-cv-01358-E (N.D. Tex.) (the “Class Action” or “lawsuit”). It has been pending since September 27, 2019. The Court supervising the case is the United States District Court for the Northern District of Texas. The individuals who brought this lawsuit are called the Class Representatives, and the persons that were sued are called the Defendants. The Class Representatives—Jason Coleman and Jessica Casey—were participants in the Plan. Defendants are Neil M. Brozen, Robert Peterson, Jr., Vasilisa Peterson, Mike Paxton, Nick Bouras, Sterling Investment Partners III, L.P., Nicole Peterson 2012 Irrevocable Trust, and Brooke Peterson 2012 Irrevocable Trust. The claims in the lawsuit are described below in Item 2 below, and additional information about them, including a copy of the operative First Amended Complaint, is available at <https://RVNBESOPSettlement.com>.

The Settlement

Following negotiations facilitated by a mediator with Class Counsel, Counsel for the Secretary, Defendants, and Defense Counsel, a Settlement has been reached. If the Settlement is approved, a Qualified Settlement Fund of \$12,727,272.73 will be established to resolve the claims against Defendants in the Class Action and Secretary's Action as part of the Settlement. The "Net Settlement Amount" is \$12,727,272.73 plus any interest earned by the Qualified Settlement Fund minus all Court-approved: (a) Attorneys' Fees and Costs; (b) Administrative Expenses; and (c) Case Contribution Awards. The Net Settlement Amount will be allocated to Settlement Class Members according to a Plan of Allocation to be approved by the Court and further described below in Item 5.

Statement of Attorneys' Fees and Costs, Administrative Expenses, and Case Contribution Awards Sought in the Class Action

Class Counsel has devoted hundreds of hours to investigating the facts, prosecuting the lawsuit, reviewing documents obtained from Defendants and third parties, and negotiating the Settlement. During that time, they also have advanced significant costs, including expert fees and travel costs, necessary to pursue the case. Class Counsel took the risk of litigation and have not been paid for any of their time or for any of these costs throughout the time this case has been pending.

Class Counsel will apply to the Court for payment of Attorneys' Fees for their work in the case and the litigation costs advanced. The amount of fees and costs that Class Counsel will request will not exceed fifteen percent (15%) of the Class Settlement Amount (\$1,909,090.90, which is 15% of \$12,727,272.73). In addition, Class Counsel will seek to recover Administrative Expenses associated with the Settlement, and request Case Contribution Awards of up to \$20,000 for each of the two Class Representatives. Any Attorneys' Fees and Costs, Case Contribution Awards, and Administrative Expenses awarded by the Court will be paid or reimbursed from the Qualified Settlement Fund.

A full and formal application for Attorneys' Fees and Costs, Case Contribution Awards, and Administrative Expenses will be filed with the Court on or before June 7, 2025. This application will be made available at <https://RVNBESOPSettlement.com>. You may also obtain a copy of this application through the Public Access to Court Electronic Records System (PACER) at <http://www.pacer.gov>, or by appearing in person during regular business hours at the Office of the Clerk of the United States District Court for the Northern District of Texas, 1100 Commerce Street, Dallas, Texas 75242-1003.

1. Why Did I Receive This Settlement Notice?

The Court caused this Notice to be sent to you because our records indicate that you may be a Settlement Class Member. If you fall within the definition of the Settlement Class, you have a right to know about the Settlement and about all of the options available to you before the Court decides whether to give its final approval to the Settlement. If the Court approves the Settlement, and after any objections and appeals are resolved, the Net Settlement Amount will be allocated among Settlement Class Members according to a Court-approved Plan of Allocation.

2. What Is the Class Action About?

In the Class Action, the Class Representatives claim that the Defendants improperly administered the Plan and, following the termination of the Plan, caused the stock held by the Plan to be redeemed at a price that was below fair market value. Defendants deny all claims and assert that they have always acted prudently and in the best interests of participants and beneficiaries.

3. Why Is There A Settlement?

The Court has not reached a final decision as to the Class Representatives' claims. Instead, the Class Representatives and Defendants have agreed to the Settlement. The Settlement is the product of extensive negotiations between the Class Representatives, the Secretary, Defendants, and their respective counsel. These negotiations were facilitated by an experienced mediator. The parties to the Settlement have taken into account the uncertainty, risks, and costs of litigation and have concluded that it is desirable to settle on the terms and conditions set forth in the Global Settlement Agreement. The Class Representatives and Class Counsel believe that the Settlement is best for the Settlement Class. Nothing in the Settlement Agreement is an admission or concession on Defendants' part of any fault or liability whatsoever. They have entered into the Settlement Agreement to avoid the uncertainty, expense, and burden of additional litigation.

4. What Does the Settlement Provide?

Under the Settlement, Defendants or their insurers will pay \$12,727,272.73 into a Qualified Settlement Fund to resolve the claims of the Settlement Class against Defendants. The Net Settlement Amount (after deduction of any Court-approved Attorneys' Fees and Costs, Case Contribution Awards, and Administrative Expenses) will be allocated to Settlement Class Members according to a Plan of Allocation to be approved by the Court (as explained further in Item 5, below). Class Members who are entitled to a distribution will receive their distribution as a rollover to a qualified retirement account or by check.

All Settlement Class Members and anyone claiming through them will fully release the Defendants and the Released Parties from certain Released Claims, as defined in the Settlement Agreement. The Released Parties include each Defendant and certain related parties as outlined in the Settlement Agreement. The Released Claims include any claims against any of the Released Parties with respect to the Plan that were asserted in the Class Action against Defendants, in the case against certain Defendants brought by the Secretary, or which could have been asserted against Defendants in connection with the Plan.

This is *only* a summary of the Released Claims, and is not a binding description. The governing releases are found within Article 7 of the Settlement Agreement, which is available at <https://RVNBESOPSettlement.com>.

The Defendants in the Secretary's Action will also pay to the Secretary a penalty of \$1,272,727.27, which is equal to 10% of the Class Settlement Amount, in connection with settling the claims brought by the Secretary in the Secretary's Action.

5. How Much Will My Distribution Be?

The amount, if any, that will be allocated to you will be based upon records provided by the Plan's recordkeeper. Calculations regarding individual distributions will be performed by the Settlement Administrator, whose determinations will be final and binding, pursuant to the Court-approved Plan of Allocation.

To receive a distribution from the Net Settlement Amount, you must be a "Settlement Class Member" as described on page 1 of this Notice.

There are 1,172 Settlement Class Members according to preliminary review of Plan records. Pursuant to the proposed Plan of Allocation, the Net Settlement Amount will be divided *pro rata* among Settlement Class Members. Each Settlement Class Member will have the opportunity to receive a share of the Net Settlement Amount (defined in the Settlement Agreement as their "Settlement Credit Amount") based on the amount of the stock allocated to their Plan accounts relative to other Class Members as of June 29, 2017, the date of the Plan's termination. The Settlement Agreement (in Article 5) provides the following illustrative example of the proposed Plan of Allocation:

For illustrative purposes, if it is assumed that (i) the Net Settlement Amount equals \$10 million, (ii) the total shares of stock allocated to Participants' Plan accounts equals 52,000 shares; and (iii) Class Member A's Plan account held 100 shares, then Class Member A's Settlement Credit Amount equals \$19,230. This is because Class Member A's percentage of the stock allocated to Plan Participants' Accounts equals 0.1923% ($100/52,000=0.001923$), and the Net Settlement Amount multiplied by 0.1923% equals \$19,230 ($\$10,000,000*0.001923=\$19,230$).

A more complete description regarding the details of the Plan of Allocation can be found in the Settlement Agreement, which is available at <https://RVNBESOPSettlement.com>.

6. How Can I Receive My Distribution?

A sample Rollover Form is enclosed with this Notice and explains the steps necessary to receive your share of the Settlement via direct rollover to an individual retirement account or qualified employer plan. You may make an election by completing the Rollover Form online at <https://RVNBESOPSettlement.com>. Rollover Forms should be submitted prior to the date set forth above for the Fairness Hearing. Settlement payments distributed via direct rollover will not be subject to automatic withholdings. Further information regarding rollovers can be found at the end of this Notice on page 10.

All other settlement payments will be mailed in the form of a check. You do not need to do anything to receive a check. However, because checks will be sent by mail, it is important to notify the Settlement Administrator at (866)675-3082 or via the contact form at <https://RVNBESOPSettlement.com> of any changes to your mailing address. You may also notify Class Counsel (identified in Item 11, below) of any changes to your mailing address.

Payments made directly to Class Members by check are subject to automatic tax withholding and tax reporting, as determined by the Settlement Administrator. Any tax withheld by the Settlement Administrator may not constitute all tax that you may owe in connection with your settlement payment. You will be responsible for determining and paying any tax that is due but was not automatically withheld in connection with your settlement payment.

If you submit a Rollover Form but your requested rollover is not effectuated for any reason (for example, because your Rollover Form was submitted too late, the information that you provided was not sufficient, or the financial institution that you designated did not accept the rollover), the Settlement Administrator will attempt to mail you a check. Such checks will be subject to automatic tax withholding and reporting, as determined by the Settlement Administrator, and all other terms of the Settlement Agreement that apply to payments by check.

7. When Will I Receive My Distribution?

The timing of the distribution of the Net Settlement Amount is conditioned on several matters, including the Court's final approval of the Settlement in this Action and the Consent Judgment in the Secretary's Action and any approvals becoming final and no longer subject to any appeals in any court. An appeal of the final approval orders may take several years. If the Settlement is approved by the Court and there are no appeals, the Settlement distribution likely will occur within approximately four months of the Court's Final Approval Order in this Action and the Consent Judgment in the Secretary's Action, unless there are unforeseen circumstances. There will be no payments under the Settlement if the Settlement Agreement is terminated.

8. Can I Exclude Myself from The Settlement?

No. The Class has been certified for Settlement purposes under Federal Rule of Civil Procedure 23(b). Therefore, as a Settlement Class Member, you are bound by the Settlement (if it receives final Court approval) and any judgments or orders that are entered in the Class Action. If you wish to object to any part of the Settlement, you may file an objection with the Clerk of the Court and write to Class Counsel and Defense Counsel about why you object to the Settlement, as discussed below.

9. Do I Have a Lawyer in The Case?

The Court has appointed the law firms of Bailey & Glasser LLP and Ajamie LLP as Class Counsel in the Class Action. If you want to be represented by your own lawyer, you may hire one at your own expense.

10. How Will the Lawyers Be Paid?

Class Counsel will file a motion for an award of Attorneys' Fees and Costs, Case Contribution Awards, and Administrative Expenses, prior to the objection deadline. This motion will be considered at the Fairness Hearing. Class Counsel will limit their application for Attorneys' Fees and advanced litigation costs to not more than fifteen percent (15%) of the Class Settlement Amount. In addition, Class Counsel will seek to recover administrative expenses associated with the Settlement as well as a Case Contribution Award for the two Class Representatives. The Court will determine the amount of fees, costs, case contribution award, and administrative expenses that will be awarded, if any. All papers filed in this Class Action, including Class Counsel's motion for Attorneys' Fees and Costs, Case Contribution Awards, and Administrative Expenses, will be available for review on the Settlement Website <https://RVNBESOPSettlement.com> and via the Public Access to Court Electronic Records System (PACER), available online at <http://www.pacer.gov>.

11. How Do I Tell the Court If I Don't Like the Settlement?

If you are a Settlement Class Member, you can object to the Settlement by mailing to Class Counsel and to Defense Counsel at the addresses below a written objection explaining why you object and enclosing any supporting documents. Your written objection must: (1) clearly identify the case name and number: *Coleman, et al. v. Brozen, et al.*, Case No. 3:20-cv-01358-E; (2) include your full name, current address, and telephone number; (3) describe the position you wish to assert, including the factual and legal grounds for the position; (4) provide copies of all documents that you wish to submit in support of your position; (5) provide the name(s), address(es) and phone number(s) of any attorney(s) representing you; and (6) include your signature. Your written objection and supporting documents must be mailed to Class Counsel and Defense Counsel and postmarked no later than 30 calendar days prior to Fairness Hearing to be considered. Class Counsel and Defense Counsel will have an opportunity to respond to your objection. You also must file your objection with the Court by mailing or hand delivering it to the Clerk of Court of the United States District Court for the Northern District of Texas, 1100 Commerce Street, Dallas, Texas 75242-1003. There is also a web portal for filing documents on the Court's website, <https://www.flmd.uscourts.gov/electronic-document-submission-web-portal>.

CLASS COUNSEL	DEFENSE COUNSEL
Gregory Porter Bailey & Glasser, LLP 1055 Thomas Jefferson Street, NW Suite 540 Washington, DC 20007	Todd D. Wozniak Lindsey R. Camp HOLLAND & KNIGHT, LLP 1180 West Peachtree Street NW Suite 1800 Atlanta, Georgia 30309 J. Christian Nemeth MCDERMOTT WILL & EMERY LLP 333 SE 2nd Avenue, Suite 4500, Miami, FL 33131-2184 Peter B. Allport LEVIN SCHREDER & CAREY, Ltd. 120 North LaSalle Street, Floor 38 Chicago, Illinois 60602

12. When and Where Will the Court Decide Whether to Approve the Settlement?

The Court will hold a Fairness Hearing at **July 22, 2025 at 2:00 p.m.**, at United States District Court for the Northern District of Texas, 1100 Commerce Street, Dallas, Texas 75242-1003, in Courtroom 1310. At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court also will consider the motion for Attorneys’ Fees and Costs, Case Contribution Award, and Administrative Expenses. If there are objections, the Court will consider them then. You do not have to appear at the Fairness Hearing in order to have your objection considered by the Court. Please note that if the Fairness Hearing is rescheduled, or if it is held by video conference or telephone, a notice will be posted on the Settlement Website at <https://RVNBESOPSettlement.com>.

13. Do I Have to Attend the Fairness Hearing?

No, but you are welcome to come at your own expense. You may also make an appearance through an attorney at your own expense. If you send an objection, you do not have to come to the Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it.

14. May I Speak at The Fairness Hearing?

Yes. If you wish to attend and speak at the Fairness Hearing, you must file an intent of notice to participate with the Clerk of the Court and mail to Class Counsel and Defense Counsel (as identified in Item 11, above) a notice of intent to appear postmarked at least 14 calendar days before the Fairness Hearing. In order to speak at the Fairness Hearing, you must also comply with the requirements for making an objection (described above in Item 11, above) if you wish to object to the Settlement.

15. What Happens If I Do Nothing at All?

If you are a “Settlement Class Member” as described on page 1, and you do nothing, the Settlement Administrator will attempt to mail your *pro rata* share of the Net Settlement Amount directly to you via check, if the Settlement is finally approved.

16. How Do I Get More Information?

If you have questions regarding the Settlement, you can visit <https://RVNBESOPSettlement.com>, call (866)675-3082 or write to the Settlement Administrator at *Coleman, et al. v. Brozen, et al.*, c/o Settlement Administrator – 8337, P.O. Box 26170, Santa Ana, CA 92799. All papers filed in this lawsuit are also available for review via the Public Access to Court Electronic Records System (PACER), at <http://www.pacer.gov>, and can be reviewed in person during regular business hours at the Office of the Clerk of the United States District Court for the Northern District of Texas, 1100 Commerce Street, Dallas, Texas 75242-1003. Please note that neither RVNB nor any current or former employees, attorneys, or representatives of RVNB may advise you regarding the Settlement or how you should proceed.

YOUR ROLLOVER OPTIONS

The Settlement Administrator has determined that the payment you are receiving from the Qualified Settlement Fund (“Fund”) is eligible to be rolled over to an Individual Retirement Account (“IRA”) or an employer plan. This Q&A is intended to help you decide whether to do such a rollover. This notice describes the rollover rules that apply to payments from the Fund.

GENERAL INFORMATION ABOUT ROLLOVERS

How can a rollover affect my taxes? You will be taxed on a payment from the Fund if you do not roll it over. If you are under age 59½ and do not do a rollover, you will also have to pay a 10% additional income tax on early distributions (generally, distributions made before age 59½), unless an exception applies. However, if you do a rollover, you will not have to pay tax until you receive payments later and the 10% additional income tax will not apply if those payments are made after you are age 59½ (or if an exception to the 10% additional income tax applies).

What types of retirement accounts and plans may accept my rollover? You may roll over the payment to either an IRA (an individual retirement account or individual retirement annuity) or an employer plan (a 401(k), section 403(b) plan, or governmental section 457(b) plan) that will accept the rollover. The rules of the IRA or employer plan that holds the rollover will determine your investment options, fees, and rights to payment from the IRA or employer plan (for example, IRAs are not subject to spousal consent rules, and IRAs may not provide loans). Further, the amount rolled over will become subject to the tax rules that apply to the IRA or employer plan.

How do I do a rollover? There are two ways to do a rollover. You can do either a direct rollover or a 60-day rollover.

If you do a direct rollover, the Fund will make the payment directly to your IRA or an employer plan. You should contact the IRA sponsor or the administrator of the employer plan for information on how to do a direct rollover. The information they give you can then be used to complete the settlement administration form. You generally need to have an account opened (even if it is not funded) for an institution to process your rollover.

If you do not do a direct rollover, you may still do a rollover by making a deposit into an IRA or eligible employer plan that will accept it. Generally, you will have 60 days after you receive the payment to make the deposit. If you do not do a direct rollover, the Fund is required to withhold 20% of the payment for federal income taxes (up to the amount of cash and property received other than employer stock). This means that, in order to roll over the entire payment in a 60-day rollover, you must use other funds to make up for the 20% withheld. If you do not roll over the entire amount of the payment, the portion not rolled over will be taxed and will be subject to the 10% additional income tax on early distributions if you are under age 59½ (unless an exception applies).

Sample Election / Rollover Form

«FirstName» «LastName» «BusinessName»
 «Address1» «Address2»
 «City», «State» «Zip»

SIMID «SIMID»
 JUNE 2025

You may be eligible to receive a payment from a class action settlement. The court has preliminarily approved the class settlement of *Coleman, et al. v. Brozen, et al.*, Case No. 3:20-cv-01358-E (N.D. Tex.). The Settlement will provide, among other things, for a \$12,727,272.73 Qualified Settlement Fund that will be allocated to eligible Settlement Class Members after any Court-approved deductions for Attorneys' Fees and Costs, Case Contribution Awards, and Administrative Expenses. The terms of that Settlement are summarized in the Notice of Class Action Settlement. For additional information, please review the Class Notice, or call (866) 675-3082.

This Rollover Form is ONLY for Class Members who would like to elect to receive their settlement payment through a rollover to a qualified retirement account through direct deposit or by paper check. To do so, Class Members must complete and sign this form and received on or before **July 22, 2025**. Please review the instructions below carefully. Former Participants who do not complete and timely return this form will receive their settlement payment by a check payable to themselves (subject to applicable tax withholding). If you have questions regarding this form, you may contact the Settlement Administrator at (866) 675-3082 or info@RVNBESOPSettlement.com.

Instructions for Completing Former Participant Rollover Form Online.

1. If you would like to receive your settlement payment through a rollover to a qualified retirement account, complete this rollover form. It is your responsibility to ensure the Settlement Administrator has timely received your Rollover Form by **July 22, 2025**.
2. You must provide all required information (including date of birth and social security number) and sign your form where indicated.
3. If you omit to provide all necessary information or fail to sign your form, payment will be made to you by check.
4. If you change your address after sending in your Rollover Form online, please provide your new address to the Settlement Administrator as soon as possible.
5. To start your online Rollover Form, you will need your Unique ID «ClaimLoginID» and PIN «ClaimLoginPIN».

Questions? If you have any questions about this Rollover Form or need assistance finding your Unique and PIN, please call the Settlement Administrator at (866) 675-3082. The Settlement Administrator will provide advice only regarding completing this form and will not provide financial, tax or other advice concerning the Settlement. You therefore may want to consult with your financial or tax advisor.

Note: The timing of the distribution of the Settlement payments is conditioned on several matters, including the Court's final approval of the Settlement and any approval becoming final and no longer subject to any appeals in any court. If the Settlement is approved by the Court, and there are no appeals, the first Settlement distribution likely will occur within sixty days of the Court's Final Approval Order.

Participants Information

Name:
 Address:
 City:
 State:
 ZIP:
 Home Phone:
 Cell Phone:
 SSN:
 Date of Birth:
 Email Address:

If the Participant is Deceased the next section would need to be completed.

Beneficiary or Alternate Payee Information

Can only Select one of the below options:

☐ Check here if you are the **surviving spouse or other beneficiary** for the Participant and the Participant is deceased. **Documentation must be provided showing current authority of the representative to file on behalf of the deceased.** Please complete the information below.

☐ Check here if you are an alternate payee under a qualified domestic relations order (QDRO). The Settlement Administrator may contact you with further instructions. Please complete the information below.

Beneficiary Name:

Beneficiary Address:

Beneficiary City:

Beneficiary State:

Beneficiary ZIP:

Beneficiary Home Phone:

Beneficiary Cell Phone:

Beneficiary SSN:

Beneficiary Date of Birth:

Beneficiary Email Address:

Upload Documentation Online.

Payment Election: Rollover to an Eligible Plan

Select only one of the four (4) options below.

- 401(a)/401(k)
- Government 457(b)
- Rollover to a Roth IRA (*subject to ordinary income tax*)
- Rollover to a Traditional IRA

Select one of the three (3) option below and the information needed to complete these payments.

- via wire payment
 - a. Investment Company Name
 - b. Investment Company Address
 - c. Investment Company City
 - d. Investment Company State
 - e. Investment Company Zip
 - f. Investment Company Phone Number
 - g. Your Account Number at the Investment Company
 - h. Investment Company Account # or Iban #
 - i. Investment Company Routing # or Swift Code
- via check through U.S. Mail directly to designated financial institution
 - a. Company / Trustee's Name
 - b. Company / Trustee's Address
 - c. Company / Trustee's City
 - d. Company / Trustee's State
 - e. Company / Trustee's Zip
 - f. Company / Trustee's Phone Number
- via check through U.S. Mail to my home address - Choose the "via Check through U.S. Mail to my home address" option if you will forward the funds to a financial institution as an "indirect rollover." By selecting this option, you are indicating your intent to deposit the funds into the designated retirement account within 60 days.

Signature, Consent, and Substitute IRS W9

Under penalties of perjury under the laws of the United States of America, I certify that all of the information provided on this rollover form is true, correct, and complete and that I signed this rollover form.

2. The Social Security number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
- I am not subject to back up withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding;*** and
- I am a U.S. person (including a U.S. resident alien).

Signature: _____

Date: _____

*** The IRS does not require your consent to any provision of this document other than this Form W-9 certification to avoid backup withholding. Check here if you *are* subject to backup withholding: